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***REPLY TO NJ OFFICE**

March 14, 2018

Via ECF

Hon. William J. Martini, U.S.D.J.
United States District Court
District of New Jersey
1 Federal Square Newark, New Jersey 07102

Re: Cioffi v. Borough of Englewood Cliffs, et al.
Civil Action No. 2:16-cv-04536-WJM-MF

Judge Martini:

This office along with the Galantucci, Patuto, DeVencentes, Potter & Doyle, LLC law firm represents the plaintiff Chief Michael Cioffi ("Plaintiff" or "Chief Cioffi") in connection with the above-referenced matter.

The purpose of this letter is to request an extension of time to file opposition to the pending motions to dismiss for one cycle (two weeks). Specifically the following motions are pending: three (3) Motions to Dismiss and one (1) Motion on the Pleadings scheduled for April 2, 2018 (Docket #'s 47, 48, 49 and 55). As per the dictates of the Rule 6.1(a)(3), Plaintiff notes that it has previously been given its automatic extension under Rule 6.1(b). Given the sheer number of motions and the intricate issues involved in each, Plaintiff respectfully requests an additional cycle under the same Rule.

Plaintiff has obtained consent from counsel for Defendants Kranjac and McMorrow for the instant request. Plaintiff's counsel spoke with Philip Portantino, Esq. representing the Borough of Englewood Cliffs, Nunzio Consalvo and Mark Park. Mr. Portantino indicated that while he did not anticipate an issue, he needed to confirm he could grant the request. As of this writing, we have not heard back from Mr. Portantino.

As such, Plaintiff respectfully requests a one cycle (two week) extension be granted under Rule 6.1(b). This extension would make the motions returnable April 16, 2018, with opposition due on April 2, 2018.

Respectfully Yours
s/Richard Malagiere/
Richard Malagiere

Cc: Counsel of record via ECF